

SUMMARY REPORT FOR FOCUS GROUPS ON DISCLOSURE REQUIREMENTS UNDER NEW GAINFUL EMPLOYMENT REGULATIONS

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Background

In June 2010, the U.S. Department of Education (ED) issued a Notice of Proposed Rulemaking (NPRM) on several issues related to program integrity under the Higher Education Act of 1965, as amended. Among other things, the NPRM included proposed rules for “Establishing requirements for institutions to disclose on their Web site and in promotional materials to prospective students, the on-time completion rate, placement rate, median loan debt, program cost, and other information for programs that prepare students for gainful employment in recognized occupations.” Following a comment period on these proposed rules, ED published a set of final regulations related to these disclosure requirements in late October 2010. In addition to detailing the type of information institutions would be required to disclose on their websites, the final regulations also noted the ED would make available a form that institutions will be required to use, once available, for making the disclosures in a consistent and comparable way on their program homepages.

To facilitate the uniform disclosure of the required data elements about their gainful employment programs, ED, with technical support from the National Center for Education Statistics (NCES)¹, prepared two draft disclosure forms (one for data input and one for data output) to be reviewed and tested by two target populations: (1) students currently enrolled in the vocational and career programs described above and (2) representatives from these institutions that will be responsible for preparing the data to be disclosed on the program homepages. The information submitted by institutions into the online forms will be output back to the institution in the form of a webpage (html file) to be posted to their websites for students and their families to access.

The purpose of student testing of the template was to determine if students understand and accurately interpret the concepts and terminology, and to solicit their suggestions for possible refinements and additions to the templates. Students were also asked to rank their top 4 (of 12) data elements in priority order and then to identify the most important data element from each of the four categories contained in the template: program costs, student debt, program success, and program outcomes. The purpose of institutional representatives reviewing the online form was to determine what additional instructions, definitions, and guidance, was needed to assist institutions in understanding what data to use.

NCES contracted with Westat to help draft the focus group questions, assist in refining the NCES template, prepare the focus group screeners, recruit the respondents for each group, conduct the two focus groups, and prepare a report documenting the key findings.

¹ NCES has previous experience with both disclosures and templates. The National Postsecondary Education Cooperative (NPEC), with support from NCES, issued a report in November 2009 discussing good practices for making consumer information disclosures on institutions’ websites in support of NPEC’s mission to improve data quality and comparability of postsecondary data (see <http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2010831rev>). NPEC and NCES supported the development and testing of a consumer information disclosure template for GE programs as a follow-up to that report. In addition, NCES assisted in the development of a net price calculator template that institutions can use to meet requirements in the Higher Education Opportunity Act (HEOA) to disclose such a calculator on their websites by October 2011. NCES experience with that work allowed it to provide expertise in the technical functionality of how a disclosure template could work.

Organization of the Report

This report is divided into three sections:

1. A brief summary highlighting the key findings;
2. A section presenting detailed findings from the student focus group; and
3. A section presenting information about the institutional representatives group.

In addition, appendices are included and contain the following supplementary materials:

- **Appendix A:** Moderator's Guides for Focus Groups With Students and Institutional Representatives
- **Appendix B:** Sample Website Pages for Students, Student Ranking Forms and Results From Student Ranking of Data Elements (overall and within each of the four categories), and the Sample Template (Short Format)
- **Appendix C:** Draft Web Application for Institutional Representatives

Highlights of Findings

Highlights from the two focus groups are presented below.

Student Group

When students were asked to recall how they did research on programs and institutions that they considered attending, most reported using Internet and institutional websites to find out information on the potential schools and programs. Information they sought out included location (e.g., convenience to home or work), flexible schedule options (e.g., availability of evening classes), cost of the program, financing options, and job placement among program graduates.

Students noted that often, the published cost of a program does not include all the costs that a student will face while enrolled. For example, in the case of a culinary school, the program costs cover some required equipment needed but faculty typically recommends additional equipment that they feel compelled to buy. In addition, students noted that some fees, such as graduation fees, are not covered in the tuition and fees information provided when they enroll and more information about what is not included should be made available.

Interestingly, students said that information on student debt would greatly influence their decision about whether enroll in a program, but so much so that they said they may not want to know about it because if the debt numbers were high, students might be discouraged from enrolling in this program or pursuing this career path.

The students greatly favored having a link on the bottom of the template that pointed to other institutions' websites that offered similar programs so that they could compare across institutions. Even more so, they would favor a centralized website that would facilitate side-by-side comparisons of programs.

Institutional Representative Group

Overall, the representatives from the proprietary institutions were the most comfortable and familiar with the types of data requested on the web application form. All respondents asked for as much guidance as possible on how to report the data requested on the form. For example, they were looking for specific dates and timeframes to define "completers", clarification on the sources of debt, and exactly what data are included in each. Whenever possible, detailed instructions and definitions of terms should be provided.

One of the terms that caused the most confusion, particularly with the community colleges, was the term "normal time." Community college representatives clearly misunderstood what this means and lacked knowledge about the requirement that institutions must define "normal time" for any of their Title IV programs and include it in their institution's catalog. There should be clear guidance regarding this terminology. .

Reporting costs by program was also a concept with which the community college representatives were uncomfortable. Because the respondents are IPEDS keyholders and most community colleges report costs to IPEDS on an academic year calendar and not by program, this was not a familiar way of reporting these data. Conversely, many proprietary institutions already talk about their costs for the entire program and also many report tuition data to IPEDS by program, so this type of reporting seemed much more comfortable to them.

The section on median cumulative debt by loan type was the most confusing to respondents. They wanted more clarification on what is included in each loan type and were not entirely clear on how to calculate a median cumulative debt.

Finally, the proprietary institutions are already reporting job placement rates on their websites and were not particularly concerned with this section of the form. However, community colleges struggled with how they would obtain and report this information.

Detailed Findings from Focus Group with Students

Characteristics of Focus Group Participants

All nine respondents (four men, five women) in the student focus group were recruited from nine different postsecondary education institutions in the Washington, D.C., metropolitan area. Seven were enrolled in proprietary schools and two were enrolled in community colleges.

All students were enrolled in certificate programs in one of five fields: medical assistant or billing, cosmetology, construction management, culinary arts, and Commercial Driver's License training. Five students were enrolled in 1-year certificate programs and four were enrolled in 2-year certificate programs, and the average length of time students were enrolled in their current program was 9 months (ranged from 2 months – 1.5 years). All students were from low-to moderate-income families.

Student Responses to Contextual Questions

(See appendix A-1 for the student focus group moderator's guide.)

Before asking specific questions about the draft template/forms, students were asked contextual questions about their current program, how they learned about it, and the types of information they used when searching for an institution.

1. How students learned about the program

- Newspaper advertisement
- TV ads
- High school
- Past experience with the institution (e.g., recreational classes)
- Location (next door to her job)
- Online search
- A friend

2. Students' reasons for interest in program

Students indicated that the program would prepare them for the job they wanted (e.g., truck driving), and the certificate was a foundation for ongoing career mobility that could be built upon by additional related training and certificate programs allowing for jobs at varying levels in the field (e.g., construction management). Additionally, students thought the program was a stepping stone to more education and they could transfer the credits to an associate's or bachelor's degree program.

Cosmetology students mentioned the flexibility in hours and the ability to become their own boss as a draw for the program.

3. Students' experiences during the search and decision process

Several students visited and now attend institutions that they visited because of friends. Other students identified institutions based on convenience and recommendations from others that knew the reputation of the institution in the field. One student researched both certificate programs and 2- and 4- year degree programs and talked to friends in his industry, and decided to take the certificate program because it was a shorter training that would allow him to get in the field quickly.

One student noted some negative experiences visiting institutions during his search, including being given a handout to study during a visit, hearing negative comments from students at the institution during the visit, and observing that teachers at an institution did not want to be there.

4. How students learned which colleges offered their program

Most students conducted internet searches looking for institutions that offered their program of interest, especially in the local area. One student also looked specifically for programs that were accredited and had hands-on training.

5. Types of information students considered in their search

Most of the students were seeking information about financing options for their education (e.g., grants, loans, scholarships, payment plans), and one noted that some websites hide this type of information. For some students, financing information was their primary concern.

Students wanted more information about how institutions aided students in finding jobs, where students from the institution worked, and how well students from the institution did in their jobs. For example, the culinary student looked at local restaurants to see where the chefs came from and noted that a teacher and a graduate from a particular institution were on a popular chef tv show.

Students wanted to know what involvement their institution had in the field. For example, the cosmetology student was interested in whether the institution participated in/won any hair shows.

One student took into account that some of the certificate programs required more classes with fewer credit hours per class, which would make her spend more time in class than a program at a different institution.

6. Reasons students chose their current institution

- Convenience

- Reasonable tuition
- Flexibility of taking classes in the morning and afternoon
- Payment plans
- Discussions with students enrolled at the institution

7. Information students would have liked to know about their program and school before enrolling

Students wished they had known what courses were taught, as well as which courses were not taught, and whether courses overlapped with other programs that could lead to a dual certificate. Additionally, the difficulty of the coursework was not clear to some students when they started the program.

Students would have also liked to have known whether they could transfer to a different location or branch of the school, and the logistics and cost of doing so.

Summary of Student Responses to Questions about the Template (Long Version)

(See appendix B-1 for the sample website pages for students.)

1. Program level (e.g., certificate)

Students described a certificate program as one that is “comparable to a 2-year degree that gives you knowledge and experience within a particular field.” A certificate provides knowledge within a specific field, whereas a 2-year program would provide a broader education.

In describing the difference between a certificate and a degree-granting program, students mentioned flexibility in the length of time to complete, intensity in terms of subject matter and knowledge gained during the program, and the ability to move more quickly into a career.

Other information students would like to know about the program level included specifics about what can be done with the certificate, if the certificate is valid in a different state or county, and whether credits earned toward the certificate could be applied to a 2-year degree.

2. Program length (e.g., 900 contact hours)

All students agreed program length was very important information to them in selecting a program, but most of the students were very confused about what “contact” hours meant. Some students thought that 900 contact hours (example from the template) seemed “extreme,” “overwhelming,” and “ridiculously long.” All agreed there needs to be more description here and that a breakdown should be added. For example, of the 900 hours, how many hours are spent in the classroom versus in hands-on training? If all hours are in the classroom, the term could be changed to “in school” or “classroom hours” to be more descriptive.

One student thought the concept of credit hours was easier to understand, and most students thought that information about how long it takes students to complete the program is important information as well as contact hours.

3. Program costs (items from the template included tuition and fees for entire program, and books and supplies for entire program)

a. Tuition and fees

Students all agreed that tuition and fees information was very important. Students agreed that the item covered under tuition was the cost of the classes; they had some ideas of what was covered under fees (e.g., kit, books, lab coat, uniform), but thought it should be made clearer exactly what is covered under fees. Additionally, students were unclear why some items were under fees and not tuition.

Students noted that additional fees have come up as they progressed through the program (e.g., graduation fees) and that there should be an indication that these items are excluded from the total cost.

b. Books and supplies

Most students agreed having information on supplies is very important, though one thought it was just “kind of important” because it is a rough estimate. All students responded that it was not clear how supplies are different from fees, but thought that certain items should be covered under supplies including:

- exactly what supplies are required, how many are required, and the estimated cost of each;
- exactly what books are needed and the estimated cost for these books;
- whether there are optional supplies and what the cost is for those supplies; and
- whether students are responsible for purchasing and obtaining their own books or whether the student pays the college and the college provides the books for the student.

4. Student debt (percentage of program graduates who graduated with educational debt; median debt for program graduates—total, federal, private educational loans, and institutional financing plans; repayment of debt; and default rate)

a. Percentage of program graduates who graduated with educational debt

Most respondents said this information could potentially have a very large impact on their decision to attend the school or not, to the point where they might not want to know the amount of debt because it would discourage them from pursuing that program or career path if the sum were high.

Students wondered whether all the debt was from a particular program, or if some students had other debt from programs they had attended previously. One student thought more helpful information

would be the salary they would make after completing the program, which would help them figure out if they would be able to pay off the debt.

One student felt this information was not relevant to picking a program, as it could be more of an indication of the population of students that are in the program (e.g., low-income vs. higher income) than a reflection of the institution or program.

b. Median debt for graduates

All students thought that other students would know what the median means, but almost all the students thought median meant the same thing as average. They explained, when asked, that to compute the average, add up the debt, and divide by the number of people attending school.

Students understood that aid amounts could range since everyone receives a different amount of aid. Students were concerned that there was a lack of contextual information for this section. For example, the number of students in the class was not displayed.

One student thought that this information was more about the students than the institution, and was not an indicator of the quality of the institution. Some were concerned that this type of information might be daunting and scare students away from attending an institution.

c. Total, federal, private, and institutional financing plan breakdown

All students agreed that information about median debt and breakdown of loans is moderately important, however, they generally struggled with understanding this breakdown and the differences among the three types of loans. One student thought the purpose was to allow students to get an idea of what the possibility is for receiving different loans.

While most students were not clear about the differences, one student offered his definition of the differences among the types of loans indicating that with Federal loans, interest is deferred; for private loans, interest is building while in school; and institutional loans “could be anything—it could be scholarships, it could be money they give and they’ll charge you a ton of interest, or interest . . . starting at graduation.”

One student said that if he saw big numbers, he wouldn’t want to attend the school, explaining that there are different scenarios—some people don’t want to take out loans because of the current state of the economy, but others may want to take out loans to build credit. If he saw small numbers, he would want to read more about the school.

Respondents suggested that a hyperlink to information about the breakdown would be helpful, as they would like to better understand the differences.

When asked how they might use this information, one student said she might be able to tell the institution’s true focus (education or profit) based on the breakdown (e.g., financing plans vs. federal

loans). Another thought it might let a student know whether he would be able to get funding from the school, or if he would need to get his own external loans. Another student would prefer to know how much interest is accruing over time, what she would have to pay, and how much she would be looking at, at graduation.

- d. Repayment of debt (percent of students who left or graduated from this institution who are making payments to repay their federal student loans) (e.g., 60 percent)

All students agreed the information on repayment of debt is moderately important.

When asked what they think it means when 60 percent of students who left or graduated are making payments to repay their Federal student loans, all agreed that there should be a breakdown distinguishing between those who left without a credential and those who graduated.

Students were confused by the phrase “left or graduated,” or thought the wording was unclear. They indicated that the wording makes it sound as though the people who left have started working in their field and are now paying on their loans or that people who are graduating have enough money to make payments on loans.

Some were also confused as to whether “60 percent of students who graduated had federal loans and are repaying OR, 60 percent of students are repaying and everyone had federal loans” and suggested clarification on this point.

When asked what this information tells them about the institution, some students understood that it tells them that the majority of students are successfully paying back their loans and that the people have enough money from their salary to pay back their loans.

- e. Default rate (percentage of students who have left or graduated from this institution who have defaulted on their federal student loans)

When asked about the definition of default rate, one respondent correctly defined this as when the student has gone a certain period of time without making a payment. A couple, but not all, of the students thought it would be good to have this information when comparing schools, if all schools were required to have this information on their websites. Students were also more interested in knowing this information for a particular program, not the institution. One student stated that they should only post default information if they also posted the information about students that are repaying loans, and vice versa. One student would reconsider applying to a school if she saw people defaulting.

A few of the respondents didn’t think enough information was presented in this section. One student would want to know how long it took people to default and how much it was (e.g., a

pie chart). While one student wanted to know if students ever defaulted, most students wanted to know when students had defaulted and would like a timeframe of 2-3 years, though a few students would want to know if it was within 5 years.

5. Program Success (Template items: first-year retention rate and on-time graduation rate)

a) Retention rate

Respondents equated the term “program success” with completing or graduating from the program, getting a job (two). When asked what the following statement meant: “58 percent of students who began their studies in 2009 either completed the program within the first year or returned to the institution to continue their program for a second year,” all but one of the students stated that they found the statement confusing.

Generally, students thought the information would be difficult to use because the length of the program is not clearly specified.

b) On-time graduation rate

When asked the meaning of the next example, “50 percent of graduates from this program finished within 12 months,” several respondents agreed that this statement doesn’t include enough information (e.g., whether the students are full or part time) and all students thought the information was not helpful because it’s not clear if this length, 12 months, and the program length are the same in the same measure.

c) Additional comments

When asked what would be more helpful, the majority of respondents indicated that more clarity about the length of the program would be helpful, and that with changes and clarification the information would be important for students. One thought it should provide a breakdown of: (1) number of people who graduate, (2) how long it takes a full-time student to complete the program, (3) how long it takes a part-time student to complete, and (4) the total number of hours (for both full- and part-time) to complete. Another thought is should include how many students completed and how many dropped.

6. Program outcomes (Template items: job placement rate for students who finished the program, employers who have hired graduates from this program, and related occupations)

Students shared that when thinking of “program outcomes,” they thought about job placement and continued success, and salary. They see a high job placement rate in the field as a key indication of a successful program.

a. Job placement rate for students who finished the program

All respondents agreed that the job placement rate is very important. Most of the respondents indicated they are just interested in knowing about the job placement rate in the particular program/field; however, a few students would like to see both types of employment—job in field, and any general job.

Students also wanted to know the timeframe in which students were placed—within say 3 to 6 months.

Students were fairly indifferent about the agency reporting the data, though one respondent questioned the truthfulness of data if the people reporting are affiliated with the school.

b. Employers who have hired graduates of this program

All but one student agreed that the information was very important, and would like to have the information when making a decision. Some students thought it would be nice to have links to the employers' websites and that it would help to have job titles for the employees from their institution, though one student disagreed.

c. Related occupations

All respondents were confused by this list of related occupations linking them to the previous information about employers who hired graduates from the program rather than a list of the types of jobs they could find after completing the program.

7. List of other institutions that offer this career/occupational program

All students agreed it's a great idea to provide this information, that it's definitely useful, very important, and they would all use it. One student suggested they would like the ability to compare the same information from several institutions simultaneously on the same website.

Summary of Responses from Ranking Exercise Using Template (Long Format)

(See appendix B-2 for forms and detailed results.)

1. Students' overall ranking of the information

Students were first asked to use a form to rank four pieces of information (out of 12) that would most affect their enrollment decision, with 1 being the most important and 4 the least important.

- The number one item of importance to all nine students was tuition and fees, followed by books and supplies, with five of the students indicating this was their second item of importance and three students choosing this as their third item.

- The third most highly ranked item was job placement rate, with eight students choosing this item as either their second or third item of importance and one student ranking this item fourth.

2. Students' ranking within the four categories

Students were then asked to use a second form to identify only one item under each of the four categories from the draft template (i.e., program cost, student debt, program success, and program outcomes) that would most affect their enrollment decision. Students' results are as follows:

- **Program cost**—tuition and fees was the top piece of information, with eight students choosing this item and only one choosing books and supplies.
- **Student debt**—students were evenly split between median debt for graduates broken out by type of loan and percent of students in repayment of their loans, with three students each reporting this was their top choice in this category. Two students chose percent of students with debt. (One student did not indicate his or her top choice in this category.)
- **Program success**—more students chose percent completing program within 12 months (six students) than percent of students completing program within first year or returning to continue for a second year (three students).
- **Program outcomes**—most chose job placement rate (7 students), while only 2 students chose either employers that have hired graduates of the program or related occupations.

Comments on Sample Template (Short Format)

(See appendix B-3 for a copy of the form.)

All respondents preferred this layout to the other template, which they felt was too cluttered. However, they would like more details and suggested adding a button for “more information” to the screen so students have the option to get more information if interested. For example, students liked the link to more information on defaulted loans.

Students liked the question/answer format because it was easier to understand and helped to navigate through the information. Students had suggestions for changing the titles of the four categories (i.e., costs, debt, success, jobs).

The category “success” was a problem for most respondents because they view success and jobs as the same. Respondents suggested renaming “success” to “graduation.” Initially,

respondents wanted to see “debt” changed to “loan information.” However, another respondent suggested changing it to “financing,” which the other students liked.

Additional Comments from Student Group

The final open-ended question asked students if there was any information they would like colleges to provide on their websites that wasn’t already discussed and if there were other suggestions they might have.

Students reiterated that knowing the percentage of people graduating program within a certain amount of time and the length of program would be helpful.

They also suggested there be an option on the website when listing other schools with related programs that allows them to compare two or three schools side by side, or where they can link to the schools. Another respondent would like to have the option to filter the schools alphabetically, or by location, by tuition, etc.

Detailed Findings from Focus Group with Institutional Representatives

Characteristics of Focus Group Participants

All seven respondents (two men, five women) in the institutional representatives focus group were Integrated Postsecondary Education Data System (IPEDS) keyholders at their institutions and had held that role for between 2 and 21 years, for an average of 12 years. Four held positions in proprietary schools and three worked in community colleges.

After introducing themselves, the institutional representatives were asked several contextual questions about their work with data, the organizations to which they submit data, and information about their programs that is available to students on their institution’s website.

Most institutional representatives coordinate or submit data on their schools to the state and federal government and accrediting agencies. One representative talked about how data are uploaded to IPEDS by the state agency that oversees the community college. The proprietary representatives at the smaller schools are responsible for the full range of data-related tasks that include working on issues that are directly related to compliance with Title IV eligibility.

Proprietary representatives indicated that post-graduation placement information and postgraduate assistance for job placement are on their websites. Proprietary representatives also indicated that they have student demographics and campus crime statistics on their websites. A couple of the community college representatives indicated that their institution’s websites have information including a “student right to know” link, and a link to graduation

rates, some demographic data, and a link to their institutional research office and their reports, including fact books. One community college representative served on a team that reviewed federal regulations on what information should be on their website, making sure they're in compliance.

Discussion of Disclosure Form by Institutional Representative Focus Group

(See appendix A-2 for the institutional representative focus group moderator's guide See appendix C.)

1. Instructions

All respondents thought the instructions were clear. However, respondents did have to be reminded a few times that this form would be filled out separately for each program subject to the gainful employment rule, and that with for-profit institutions, this includes degree programs as well as certificate programs.

2. OPE ID

The representatives who work with financial aid understood what the OPE ID (Office of Postsecondary Education identification number) is, though several community college representatives did not. When asked about their institution's OPE ID, only representatives from the proprietary representatives knew this information. One community college mentioned that financial aid would probably have this information and suggested adding a definition of OPE ID and including the fact that the financial aid office has this ID number.

3. Six-digit CIP for program and program name

All respondents knew what a 6-digit CIP (Classification of Instructional Programs) is, where to find it, and how to do a CIP search. It was suggested that there be clearer instructions on how the data entry box should be filled in because the 6-digit CIP codes include a decimal point.

A few respondents offer more than one certificate in the same 6-digit CIP. One of the community college representatives commented that occasionally this may happen with one or two of their certificate programs, "because of the way CIP conflates so many programs."

The focus group members agree that the opportunity to enter the institution's name for the program in addition to doing the CIP search is important.

4. Award level

All agreed the categories for award level (Certificate; Associate's Degree; Bachelor's Degree; Master's Degree; and Doctor's Degree) made sense. However, if further breakdowns of the certificate programs are going to be added, such as a less than 1 year certificate, or a 1-2 year certificate, it may be helpful to add contact hour or credit hour equivalents to those categories. One community college

representative commented that community colleges do not measure their program length by years, but by number of credit hours. All respondents know the number of contact or credit hours for their programs.

5. Program costs

a. Total current tuition and fees for entire program completed in normal time

Several concepts in this question were confusing to institutional representatives, particularly the community college representatives: the concept of normal time; the concept of tuition and fees reported by program; and how to handle tuition and fees for an entire program if it falls in more than one tuition year.

Community colleges commented that they believe this item, as it stands, does not apply to them. One remarked that there needs to be more instruction on how to calculate this: multiplying credit hours by tuition for the past 2 years, 3 years, and so on, as it could take 5 years to complete 15 credit hours. And, they change their tuition every year.

“It’s going to be very cumbersome for us to calculate how much we added, and every year, and since this is not per student, it’s difficult so we need an instruction on how to calculate as of the last reporting year, or as of 2 years ago, to balance out the increase.”

When asked if tuition is charged for the entire program, term to term, or by academic year, community college representatives responded that they charge by credit hours while two of the proprietary institutions charge for the entire length of the program, and one charges term by term.

One respondent commented that the form would need to specify exactly what is included in fees since books and supplies are a separate item.

b. Books and supplies

Community college representatives expressed general concern about entering information on books and supplies by program.

“I just don’t know what to do with the estimated cost for books and supplies. I have no idea how to go about estimating what that would be for a particular program.”

When asked if they have estimates for what the books and supplies would cost for the entire length of the program, or term-to-term, or for an academic year, a community college responded that they have estimates to report to IPEDS, but that it’s using a hypothetical full-time degree-seeking student, so it’s much more complicated for them to estimate this for certificate programs.

c. Total current annual room and board (if on-campus living is offered)

None of the institutions offer on-campus housing, so this question did not apply to them.

6. Student debt

a. Percent of completers who graduated in 2009–10 with student loan debt

In general, the community colleges were confused by this item and expressed that they would have to do some work to calculate the total percentage of completers with student loan debt.

One community college representative said it would require . . . “asking the financial aid office how much debt students had encumbered, and then matching through identification numbers with our completion file, and then try and determine from that what it is.” This representative also mentioned not being aware if her college has information on repayment of debt, which raised the question of whether they think there is a repayment component in this statement. A proprietary representative responded to this, saying that students start paying 6 months after graduating, so if they are graduating, they’ll have the percentage of students that have debt.

Concerning the year period (2009–10), all thought it would be better to specify a beginning month and ending month—July 1 through June 30 — mirroring how they report to IPEDS.

b. Median cumulative debt for completers: total, federal, private, institutional financing plan

In general, respondents expressed a great deal of confusion with this section, stating that clarification is needed. Like the previous question, all agreed that it’s important that there be more specifics on the timeframe. In addition, they specifically questioned the following:

- Why are all completers included and not just borrowers?
- Are PLUS loans [parent loans] included in the “Federal” section?
- What loans would come under “other”?
- What are institutional financing plans?

Community colleges were not certain of how to calculate a median cumulative debt for program completers and that the process to do so would be very cumbersome.

“[You would need to] get the financial aid office to give you a listing of ID numbers on it, broken by those categories there [in the template] and then the actual debt in each category, and then give it to us, and then we can match that with the graduation data and then find a place in SPSS where the median works. . . .It’s a big rigmarole.”

Proprietary schools were primarily concerned with determining whether a student had private loans and whether a student who pays cash (a nonborrower) may have actually gotten their money from a

bank, in which case it would be a private loan and they would only know about it if the check came directly to the school. One proprietary representative explained that they don't give institutional loans. They have a payment plan—whatever cash tuition the student has to pay that is not covered by financial aid, the student is responsible for paying. For those who are unable to pay all at once, they can pay over the first 3 months of the program.

Proprietary representatives tried to offer their further interpretation of what would be considered "Other Loans," saying that Sallie Mae has private financing that they give to students who are not qualified for financial aid and so maybe that and also the payment plans that the school provides would go under "Private/Other."

7. Program success

a. Number of students who entered the program in Fall 2009

Respondents did not understand that this item, combined with the several items below it, is designed to calculate the program's retention rate. Respondents all agreed that there needs to be more information and clarification on this item, and there needs to be consideration of how students are interpreting and using or are supposed to be using the information provided.

Community colleges expressed strong concern about how this information would be calculated and the amount of work that would go into it, each providing the various scenarios at their schools that would make it difficult:

One of the community colleges explained they have "students who may enter a program although they've been taking...the same general education credits in a different program perhaps that's in the same career path. We have associate degree programs and then we have pathways that are certificate programs that are rolled into that associate degree...So, a student may have begun in an associate degree program...maybe they changed their mind and wanted to be in a certificate program. So, are these students who would have no credits in any other program? Is it the start date of that program?"

A proprietary school said that there need to be specific dates as they have "open enrollment—students can start all the time."

Another community college talked about the amount of work that would go into getting this information:

One community college representative said that he is used to working with cohorts—fall-entering, first-time, new degree-seeking students. "This is calling for a program-related cohort—students who began a program in fall 2009—and that would take a lot of work...Students come in the fall, put down something, change their minds three semesters later, maybe that gets updated into the data system, or maybe it doesn't." To enter this

information, the college would have “to do a cross-term run of who knows how many students to locate the first time program X showed up in fall 2009...and that would take a lot of work, if you define it that way. If you’re willing to say that students who entered in fall 2009, and their program is the program of their entry term, that would give you weaker data but [would be] much easier to calculate.”

When asked about retention, community colleges responded that retention is easy to calculate—“once you have the first line then you have the other two.” “And [what would also help is] knowing whether or not we judge program students by either entering fall only or by actually tracking to find the fall for the program start.”

b. Enter the normal time to complete the program (in months)

Normal time is a familiar term to the proprietary institutions. Community colleges, however, are very bothered by the phrase “normal time” and there is a misunderstanding of what it means as shown by the statement below.

One community college responded that his school has data on this, explaining that the school took all the students with any degree starting 2000, gave them 10 years. “For those who earned certificates, the median certificate earning fell within the 4th year, half fell after the 4th year, and almost no one had it before the 1st or 2nd year, so that normal time thing bothers me a lot. I think there’s a misunderstanding about how...community colleges work.” Another community college representative explained that at her institution, “The mean number of credits at our institution is 8 per semester. If a certificate program is 30 credits in length, and each semester someone’s only taking 8 credits, that’s at least 2 years.”

c. Number of students who completed the program in 2009–10

Respondents would simply like further instruction on exact months and dates to be considered.

8. Program outcomes

a. Job placement rate for students who finished the program

Proprietary institutions currently report job placement rates for each of their programs and mentioned that it’s not a problem to fill this out, while this would be a new data collection for community colleges.

One proprietary institution representative noted that they have job placement offices that work directly with the graduates and will coordinate interviews, follow up, and once they get a job, there are verification forms that maintain the student record and that are signed by the

employer, by the student, and that have the employer's name and contact information. Another proprietary representative also discussed sending verifications to the graduate. A proprietary representative also noted that, to count as job placement, it has to be reported out as the student having work related to their degree/field.

When community college representatives were asked if they collect or report job placement rate information, one representative mentioned that their institution does have a graduate follow-up survey, and the others reported that they know where to get at least some employment information or they have collected this information in the past:

One representative added that they can find out if the graduates were employed, period. To get this information, they would do a memorandum of understanding between community colleges and a local four-year university that has access to Department of Labor records and social security numbers. It only says what their salary is and whether they've been working or not. "We don't get unit record data, we get it only by categories, so we could get the median or the mean salary...in occupational area...industrial zip codes."

One community college did have a grant program where they were able to get similar information—from one of the state departments, possibly economic development office. This representative sent social security numbers of students to the office, and they could tell if the student was employed in same field and employed overall.

b. Employers who have hired graduates of this program

All representatives agree there needs to be clarification with this item, especially the term "hired." "Many of our students have jobs, 50 percent of them have full-time jobs as they are studying, and when they leave, they might very well continue with their current employer. . . . So, the word hired there doesn't quite cover that, or it suggests it has to be a new job." Another asked if we're talking about new graduates or graduates from 10 years ago.

Proprietary representatives stated that they also track job titles, in addition to names of employers, but that salaries are difficult to track. They reported tracking graduates' employment anywhere from the first employment, to 30 days, to 1 year, to 3 years.

Though a few representatives were satisfied with the information presented in the current employer listing, some thought it would be helpful to the consumer to indicate in some way which employers hired the most graduates.

Representatives who were satisfied with the information on employers that have hired graduates explained that the list shows that the employer is pleased with performance and keeps coming back to hire graduates from that school. The consumer doesn't necessarily want to know about the number of graduates hired. They just want to know that these employers

are very happy and keep employing from that school. Another added consumers would just be interested in whether employers have hired and if they are willing to hire more.

9. Length of time it would take institutions to fill out this form for each certificate program at their institution

In general, the community colleges estimated it's going to take much longer to complete than the proprietary schools did. It would take community colleges *at least* 1 week to complete the form for all their programs.

One said he would complete the form in batches, noting that the school could be dealing with 40 different programs. Initial preparation to get the data would be "very burdensome." Then, it would take a few days to do the analysis. The college would also have to gather the graduate information by academic year and would need to go to the financial aid office for information.

For proprietary schools, it would take 1 to 2 days to complete, total. One representative noted that it would take a bit of time to gather the loan information, but that the format is not the problem.

10. Additional context notes

Most respondents liked the option for additional context notes. A community college representative noted (humorously) that this box is where community colleges will enter all their data.

A proprietary school representative said that for certain programs, there may be a need to expand on the data presented and it's nice to have the option.

Other Suggestions or Topics

A question was posed by the community colleges: if they do not collect certain information, is it okay to leave that particular box blank?

When asked whether there should be a phase-in period for those who don't collect these data, one of the community college representatives responded by expressing a general concern about the use of this form to inform prospective higher education students and how they receive the information in general. It's not clear to him that "the interpretation that might be made would be the kind of interpretation that NCES expects, so I hope that the first-year rollout of this is very tentative and there are follow-up studies with those who actually use this data to search for a school to attend, some sort of survey, because I think that otherwise this may not work at all for its intended purposes."

Appendix A

A-1. Moderator's Guide for Focus Group With Students

A-2. Moderator's Guide for Focus Group With Institutional Representatives

**Summary Report for
U.S. Department of Education
Gainful Employment Focus Groups**

Appendix A-1

Moderator's Guide for Focus Group with Students

WESTAT MODERATOR'S GUIDE
NCES GAINFUL EMPLOYMENT FOCUS GROUP
FOR STUDENTS ENROLLED IN PROPRIETARY SCHOOLS AND
COMMUNITY COLLEGES
(Rev. Feb 7, 2011)

Welcome

Good evening. My name is Denise and I am a researcher at Westat. I will moderate tonight's focus group. Thank you for taking time to participate in the group. First, let me tell you about the purpose of this study.

Introduction to the Study

Westat, a social science research company in Rockville, MD, is working with the U.S. Department of Education on a project to help schools provide better information about their career and training programs that lead to a certificate. Most of the discussion will focus on reviewing and discussing information contained in a few draft web pages developed by the Dept. of Education. Schools that offer these certificate programs will eventually be required to provide specific information about their programs on their web sites.

Therefore, the Dept. of Education would like to hear from consumers of the information, like you, to determine if it is clear and easy to understand before finalizing the web pages. The information you share will be used by the Dept. of Education to help students make informed decisions about the programs and schools before they enroll in them.

Focus Group Guidelines

1. No right or wrong answers. Value a variety of opinions and experiences.
2. Information shared in group will remain confidential; report only summarizing the responses and not identify you by name or school. Help us protect your confidentiality by only stating your first name and NOT mentioning the name of your school.
3. Request that students not share the information discussed with anyone outside of the group until all the data have been collected and the web pages are finalized by the Dept. of Education, which will not occur until later in the year. [*Get verbal agreement from everyone.*]

4. Explain about one-way mirror and disclose that staff from Dept. of ED and Westat are observing and taking notes on the discussion behind one-way mirror and that the session will be audio recorded.
5. Because session is being taped, it's important that you speak one at a time so I can hear what everyone has to say.
6. Turn off cell phones/Blackberries, etc. or turn them to vibrate.
7. Any questions before we begin?

Warm-Up and Opening Questions

OK, let's get started by going around the table and introducing ourselves. Please give your **first name only** and tell me what career or vocational program you are currently studying and how long you've been enrolled in the program. Please do **not** share the name of the institution you are attending. *[Or ask some other equally easy question to get the group warmed up and gives everyone a chance to share].*

1. How did you first learn about this program? *[Probe to learn if it was based on a prior job, course work in high school, a person who told them about it, or something they read.]*
2. What appealed to you about this program?

Thanks. Now, let's talk a little about when and how you started looking for colleges or schools to apply to.

3. When did you first begin looking for schools/colleges?
4. How did you learn which colleges or schools were offering this program? *[Probe to see if they learned this from: (a) the schools themselves, (b) advertisements in newspapers, TV, radio, (c) Internet searches or advertisements (d)*

high school guidance counselors (e) other students who were attending schools that offered the program.]

5. What type of information did you look for? [*Probe if not mentioned:*

- *type of career or vocational program or certificate offered*
- *cost*
- *geographic location*
- *length of program*
- *reputation of school (probe on how determined?)*
- *job placement (services, record?)*
- *Other*

6. What in particular made you choose the program at the school you currently attend?

6a. Looking back, was there information you wished you had known about the **program** prior to enrolling? If so, what? How would you have used this information?

6b. Was there information you wished you had known about the **school** before you enrolled? If so, what? How would you have used this information?

Thank you very much. For the remainder of the discussion, we will focus our attention on reviewing draft screen shots of a few web pages. I will ask you specific questions about each of the items in the screen shots. At the end of the discussion, you will be asked to rank them.

For purposes of our discussion, let's assume that all schools that offer certificate programs would be required to provide some or most of this information on their school web sites.

*Please note that we will be using a made up example for our discussion. This example is for a program in Baking and Pastry Arts. **The information and data used in the example are not real.***

- *[Moderator displays Sally's French Cooking College website and walks through first two pages to provide group with context. Then launches next section of questions by referencing the 3^d page that displays GE information disclosures.]*

7. ***First let's look at the term "program level"***

- In this example, the program level for this Baking and Pastry Arts program is listed as a "certificate." How would you describe what a certificate program means?
- What do you think is the difference, if any, between a "certificate" and a degree-granting program such as a bachelor's degree?
- What other information, if any, would you like to know about the program level?

8. ***Program length (in contact hours)***

- What does program length mean to you?
- Here, the program length for the Baking and Pastry Arts program is 900 contact hours. What does this tell you about this program?
- Were you able to translate this information into how long it would take you to complete the program in weeks, months, and/or years? Would this be useful information or not?
- How important is this information to you?
(Very important, important, somewhat important, not important)
How would you use this information?

9. ***Now let's look at the information provided about program costs. First, tuition and fees***

- What items do you think are covered under tuition? What about fees? *[If students are at a loss about what fees might be included, provide a few examples-- enrollment or application fees]*
- Do you think you could complete the entire program for this cost or do you think you would need to pay more tuition and fees later?
- What additional information would you want to know?
- How important is this information to you?
(Very important, important, somewhat important, not important)
How would you use this information?

10. Books and supplies

- What items do you think are covered under supplies? Is it clear to you how supplies are different than fees?
- Would it be helpful to have examples or a specific list?
- What additional information, if any, would you want to know?
- How important is this information to you?
(Very important, important, somewhat important, not important)
How would you use this information?

11. Now let's look at the information under Student Debt.

- What does it mean to you in this example where it says 78% of graduates in 2009 graduated with educational debt? Is this something you want to know? How would you use this information?
- Now look where it says “median debt for graduates.” What does “median” mean to you? Do you think most students like you would understand what median debt means? Do you think they would look it up if they did not understand what it meant?
- Do you understand why there is a breakdown between total, federal, private, and institutional finance plan? If yes, how would you describe the differences between these types of loans? If no, would you want to know this information?
- How important is this information to you?
(Very important, important, somewhat important, not important)
How would you use this information?

12. Repayment of Debt

- Moving to the next description under student debt: What do you think it means when 60% of students are making payments to repay their Federal student loans?
 - *[If students struggle with the correct concept, tell them what it means: When students are supposed to be making payments on their federal loans and are successfully making those payments toward the principal amount they borrowed (i.e., not just toward the interest)]*

- How important is this information on loan repayment to you?
(Very important, important, somewhat important, not important)
- What, if anything, does this information tell you about the institution?
How would you use it?

13. Lifetime default rate

- Do you understand what it means when a student defaults on federal student loans? If so, please explain what you think it means. *[If students are struggling with the accurate meaning, tell them that default means when students fail to make payments on federal loans for an extended period of time]*
- Now that you know what default means, in the example, it says that 11% of students who left or graduated from this institution have defaulted on their Federal student loans. What, if anything does that tell you? *(Probe if not mentioned on what it says about cost of the program and/or ability to find a decent paying job after leaving/ completing the program?)*
- If you had to choose, would it be more important for you to know if they defaulted on their student loans soon after graduating-- say 2 or 3 years-- or would you want to know if they **ever** defaulted on their student loans?
- Does it matter to you if this information is provided for graduates of this particular program or do you want to know about all students who attended this institution in any program, or both?

14. Now let's look at the Program Success section.

- What do you think of when you see the term “program success”?
- In our example, it says that 58% of students who began their studies in 2009 either completed the program within the first year or returned to the institution to continue their program for a second year. What does that mean to you?
How would you use this information?
- How important is this information?
(Very important, important, somewhat important, not important)
- For the next item in our example, it says that 50% of graduates from this program finished within 12 months. What does that mean to you? How would you use this information? *(Probe on what, if any, calculations they might do—e.g., the number of contact hours it would take per month to complete the program within the “normal” amount of time.)*

- How important is this information to you?
(Very important, important, somewhat important, not important.)

Now, let's talk about program outcomes.

15. Program outcomes

- What comes to mind when you see the term “program outcomes?” How would you describe what this means?

16. Job placement rate for students who finished the program

- This item in our example states that the job placement rate is 68%. What does this mean to you?
- If you had to choose, are you more interested in knowing whether this rate is for: (a) jobs related to the specific program completed, (b) for any jobs students found after they finished the program, (c) or both?
- Is there additional information you might want to know about this rate? (*Probe on whether the time frame in which students found jobs is of interest to them. If so, what time frame—6 months, 1 year, 2 years?*)
- How important is this information?
(Very important, important, somewhat important, not important)
How would you use this information?
- What, if anything, does the additional information about what agency this information is reported by mean to you?

17. Employers who have hired graduates of this program

- If you were provided with such a list, how would you use it?
- Is there additional information you might like to know? (*Probe on whether they are interested in the timeframe—employers that hired graduates who completed program in the last year? Last two years? Last 5 years?*)
- How important is this information?
(Very important, important, somewhat important, not important)

18. Related occupations

- If you were provided with such a list, how would you use it?

19. List of other institutions that offer this career/occupational program.

➤ *[Moderator displays the 4th page of the PPT showing these institutions]*

Let's look at this list. As you can see it provides the name of the institution, the address, city and state, and zip code and a link to the website.

- How would you use this information?
- How helpful do you think this information would be to you?
- How would you like to sort these institutions? (*Probe if not mentioned: state, city, zip code*)

Ranking Exercise Using ED Template [use Ranking Form]

➤ *[Moderator returns to screen shot of 3rd page of Sally's French Cooking GE Info Disclosures]*

Now, we will go through a two-part exercise. I would like you to look at this screen and this information again. On the first form I am passing around, I want you to please rank overall the four most important pieces of information that would most affect your decision whether or not to enroll in a program. You may choose ANY four pieces of information you like that are listed on the form. You should not use the same number twice.

➤ *[Moderator asks students to pass their completed OVERALL Ranking Form to her after they are finished.]*

On the second form I am passing around, I want you to please mark with an "X" the most important pieces of information WITHIN EACH BOX/CATEGORY (i.e., Program Costs, Student Debt, Program Success, and Program Outcomes) that would most affect your decision whether or not to enroll in a program. Please mark one piece of information from each category. When finished, you should have only four pieces of information with "X" next to them.

➤ *[Moderator asks students to pass their completed Form within each box to her after they are finished.]*

Sample Template (Short Format) Review

- ***[Moderator projects the screen shot #5 of the Baking and Pastry Arts Template]***

Now, we'd like you to look at the projection screen again. This is a shortened version/example of how information about certificate programs might be presented using the results of the rankings you just completed.

[Give students a moment to review the short format of the template.]

20. How does this format work for you?

- Visually, how do you like this format?
- You'll notice that the information is presented in the forms of questions and answers in each box. What do you think of the question/answer format? Is it easier to understand?
- What about the four categories—do they make sense to you?
- Are these the right names for the categories given the type of information being provided in them?
- Is this the right amount of information? Given all the information we discussed today, do you now feel that you would want more or less of the information when deciding on a program?

21. Do you have any suggestions to the way the information is presented?

Thank you. Now let's wrap up by inviting any suggestions for other information you or students like you might want to know about prior to enrolling in the career school/college.

22. Is there any information you would like colleges to provide on their websites that we haven't already discussed?

23. Are there any other suggestions or topics we have not discussed about the web page or your experiences at your current school that you would like to bring up now?

False Close

Thank you so much for being here tonight. Before we conclude, I need to step out for a few minutes to make sure we have everything ready for you.

Moderator checks with observers for up to two additional questions to pose, time permitting.

Final Close

Upon return, moderator will pose questions from observers, if any.

Well, that concludes our discussion for tonight. Again, thank you so much for taking time out of your very busy lives to be here with us tonight. The facility has your envelope ready for you. Please enjoy the rest of your evening and travel home safely.

Appendix A-2

Moderator's Guide for Focus Group with Institutional Representatives

WESTAT MODERATOR'S GUIDE
NCES GAINFUL EMPLOYMENT FOCUS GROUP
FOR INSTITUTIONAL REPRESENTATIVES FROM
PROPRIETARY SCHOOLS AND COMMUNITY COLLEGES IN
THE DC METROPOLITAN AREA
(Rev. February 7, 2011)

Welcome

Good evening. My name is Denise and I am a researcher at Westat, a social science research company. I will moderate tonight's focus group. Thank you for taking time to participate in the group. First, let me tell you about the purpose of this study.

Introduction to the Study

U.S. Department of Education has contracted with Westat to work on a project related to the new Gainful Employment regulations. Under these regulations that were issued in October 2010, postsecondary institutions like yours will be required to provide specific information about their career and training certificate programs on their websites for consumers. The U.S. Department of Education is developing an online tool that will assist institutions in meeting this disclosure requirement by having you enter data in a form that is then used to create a webpage for consumers.

Our discussion this evening will focus on the data that institutions like yours would enter in this web application form that the Dept of Education developed. We will go over this form to see if the items requested are clear and what additional information needs to be provided, such as specific definitions or instructions, to help institutions complete the information. The information you share in this group will be used to help the Dept of Education provide additional guidance to institutions and, hopefully, make it easier for them to complete the form.

While we will ask you a few questions about IPEDS, these data items are not being added to the IPEDS data collection. We just want to know a little more about what experience you have had with related terms and terminology to those being discussed today. You may not ultimately be the one on your campus responsible for meeting these disclosure requirements and filling out this form. But we want to make sure that the questions are clear for whoever is

responsible. Your experience with IPEDS and other data reporting will help us develop a more useful tool for institutions to use to disclose data.

Focus Group Guidelines

1. No right or wrong answers. Value a variety of opinions and experiences.
2. Information shared in group will remain confidential; report only summarizing the responses and not identify you by name or school. Help us protect your confidentiality by only stating your first name and NOT mentioning the name of your school.
3. Request that participants not share the information discussed with anyone outside of the group until all the data have been collected and the web pages are finalized by the Dept. of Education, which will not occur until later in 2011. [***Get verbal agreement from everyone***].
4. Explain about one-way mirror and disclose that staff from Dept. of ED and Westat are observing and taking notes on the discussion behind one-way mirror and that the session will be audio recorded. Therefore, please talk one at a time and speak in a voice at least as loud as mine..
5. Turn off cell phones/Blackberries, etc. or turn them to vibrate.
6. Any questions before we begin?

Warm-Up and Opening Questions

OK, let's get started by going around the table and introducing ourselves. Please give your **first name only** and tell me your official job title and how long you've worked at your school. To keep the names of your schools anonymous, please do NOT mention the name of your school.

First, let's talk a little about your data-related tasks at your school, and information about your school's website.

1. Do you work with IPEDS data for your school?
 - Do you work with compliance issues for participating in federal financial aid programs? What are your primary responsibilities? (*Probe on*

coordinating data to submit to ED, collecting data from the school, reporting on the data, using the data)

2. Do you coordinate or submit data on your school to agencies or organizations other than ED?
 - If so, what types of organizations or agencies?
3. To the best of your knowledge, what types of information are currently available to students on your website? *(Probe on description of programs, courses offered, length of program, cost of program, job placement services)*

Thanks. For the remainder of the discussion, we will focus our attention on reviewing a draft Gainful Employment web application form developed by the U.S. Department of Education. As I mentioned earlier, the Gainful Employment regulations issued by the Dept of ED in October 2010 require schools to provide specific information to consumers about their certificate programs (and on all programs if you are a for-profit institution). This focus group provides one among several opportunities for the institutions affected by these requirements to provide feedback to the Dept of ED to ensure the form is clear and contains helpful instructions. I will ask you specific questions about each of the items on the screen.

➤ **[Moderator displays the web app of the website.]**

4. **First let's look at the instructions at the top of the page.**
 - Is it clear to you what programs offered by your school are subject to the Gainful Employment regulations?
 - Are there other comments or questions about these instructions?
5. **What about the first item, "6-digit OPE ID."**
 - Are you clear on what OPE ID is?
 - Do you know what your institution's OPE ID is or where to find it?
 - Do you have any comments or questions about this?

6. Let's look at the next two items: **program name** *and 6-digit CIP for program*

- Do you know what a 6-digit CIP is or where to find it? Do you think you know how to do a CIP search?
- When you fill in the 6-digit CIP code, a program name will appear. This is the program name for the program as indicated in the CIP codebook. Would you want an opportunity to enter the program name the way you call it at your school?

For example, for a program in hair styling, the 6-digit CIP is 12.0407, which is listed in the CIP codebook as Hair Styling/Stylist and Hair Design.

Would you like to be able to enter the name of your program rather than this “official” name?

- Does your institution offer more than one certificate in the same 6-digit CIP? Is this typical?
- Are the certificates different program lengths: one for a 1-year program and another for a 2-year program?
- What additional instructions or information might help you complete this part of the form?
- Are there any additional questions or comments about program name?

7. **Award level**

- For the award level of the program, you will have a drop down menu on the web form. The options will be: Certificate; Associate's Degree; Bachelor's Degree; Master's Degree; and Doctor's Degree. Do these categories make sense to you?
- What do you call these categories at your school? Award levels? Program levels? Program Types? Other?
- For certificate programs, should there be more options such as: Less than one-year certificate, a 1-2 year certificate, etc.?

8. Enter **program length in hours**

- How many of you use contact hours at your school? How many of you use credit hours?

- Do you know the number of contact or credit hours for your programs?
- Do you have any additional comments or questions about this item?

The next five items (i.e., tuition and fees, books and supplies, median debt for completers, repayment of debt, and lifetime default rate) are related to program costs. Let's look at each item separately.

9. Tuition and fees

- Does your institution charge tuition to students for the entire program or term-to-term or by academic year?
- Note that the tuition and fees is for the entire length of the program, if completed in normal time. Would you know what this is for your programs?
- Is there additional information you would like to know about what you are reporting here?

10. Books and supplies

- Do you include books and supply fees as part of your tuition?
- Do you have estimates for what the books and supplies would cost for the entire length of the program? Or term-to-term? Or for an academic year?

11. Total current annual room and board (if on-campus living is offered).

- Is on-campus living offered at your campus?
- If so, are these costs standard for all students, or is there a range of options?

12. Percent of completers who graduated in 2009-10 with student loan debt.

- How do you calculate total percentage of completers with student loan debt?
- Is it clear what a completer means?
- Is it clear what student loan debt means?

13. Median cumulative debt for completers: total, federal, private, institutional financing plan

- How do you calculate a median cumulative debt for program completers? Should there be information or an example on what a median is and how to calculate it? Is it clear what it means to include both borrowers and non-borrowers in calculating the medians?
- Is it clear what is being asked in the four categories by total, federal, private, and institutional financing plan?
- Is the term, “institutional financing plan” one you are familiar with? What does your school call your school-based loans to students?
- Is there additional information you would like to know about what you are reporting here?

14. The next question is related to student persistence in the program. If you fill out IPEDS, you report similar data for “retention rates” in the Fall Enrollment survey, so it might sound familiar.

- First, what does it mean to you when it asks for the number of students that entered the program in the Fall of 2009? Is there a better way to phrase the question?
- Next, you are asked to enter the number of those students that had *completed* by the following Fall and then those that were continuing their studies the following Fall. Does that make sense to you?
- Do you understand that you are tracking the students that started the program in Fall 2009 to see what had happened to them by Fall 2010? Is there a better way to ask this question?

15. Next you are asked to enter the normal time to complete the program (in months)

- What would you report here?
- Is the “normal time to completion” the same as the average time to completion? How do they differ?
- In your programs, would you have different “normal” times to completion for full-time and part-time students?
- Do you have any additional comments or questions about this item?

16. Now let's move to the next two items:

Number of students who completed the program in 2009-10.

- Is this item clear? If not, how could it be clearer?

The number that completed the program within the normal amount of time.

- What do you interpret “normal amount of time” to mean?
- What additional information or guidance, if any, would help you provide this data?

Now, let's talk about the job placement items

17. Job placement rate for students who finished the program

- Do you know if you currently report job placement rates for your programs to your accrediting agency or state?
- Do you report them for each program or just one rate for the institution overall?
- Do you know how that agency defines job placement rates?
- Do you know how your institution tracks job placement of your graduates? (*Probe on alumni surveys, state data systems, etc.*)

17a. Enter name of the agency to whom job placement rate for program completers is reported.

- Is this an accrediting or state agency?
- Would there ever be more than one agency to which you reported job placement rate data for the same program?

18. Employers who have hired graduates of this program

- Do you currently track information on who hires graduates in your programs? How do you get this information (alumni surveys)?
- In addition to the names of employers, do you track any other information such as job title or salary? How long do you track your students, if at all, into the workplace?
- Any other comments about this?

19. How long do you think it would take you to fill out this form for each certificate program at your institution? This includes the time it takes to:

- review instructions;
- use technology to collect, process, and disclose information;
- adjust existing practices to comply with requirements;
- search data sources;
- complete and review the responses; and
- transmit or disclose information.

20. At the bottom, there is a box asking for additional content notes that would be helpful to prospective students. After seeing what types of data are on this form, do you think you would provide more information here? Is having the opportunity to provide comments helpful?

Thank you. This has been a very useful discussion. Now let's wrap up with a final question.

21. Are there any other suggestions or topics we have not discussed about the items on the form that you would like to bring up now?

Appendix B

B-1. Sample Website Pages for Students

B-2. Student Ranking Forms and Results From Student Ranking of Data Elements (overall and within each category)

B-3. Sample Template (Short Format)

**Summary Report for
U.S. Department of Education
Gainful Employment Focus Groups**

Appendix B-1

Sample Website Pages for Students



Sally's French Cooking College

About Us

Apply Here

Financial Aid

Contact Us

Want a rewarding career in the culinary or pastry arts? Learn about classic French techniques from professional chefs. Begin your new career now! Click on the programs below for more information.

- [Culinary Arts Program](#)
- [Baking and Pastry Arts Program](#)

Recreational Classes at SFCC:

- [Demonstration Classes](#)
- [Participation Classes](#)

Welcome to Sally's French Cooking College....

Student is interested in Baking and Pastry Arts and clicks here to find out more

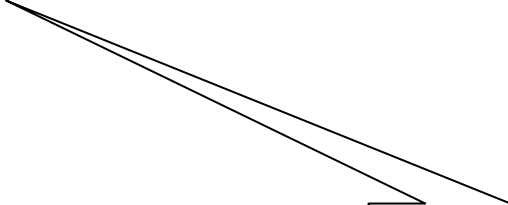


Homepage for Program

Baking and Pastry Arts Program

The Baking and Pastry Arts Program at Sally's French Cooking College is a dynamic program that combines kitchen basics; advanced kitchen training; and a paid externship. After completing the program, you'll be ready to be a pastry chef at a fine restaurant, open a cupcake shop, or compete in dessert competitions.

- [Admissions](#)
- [Curriculum](#)
- [Calendar](#)
- [Financial Aid](#)
- [Student Consumer Information on the Program](#)



Student would click here
for more information

Baking and Pastry Arts Program

Program level: Certificate

Program length: 900 contact hours

Program Costs:

Tuition and fees for entire program: \$24,000

Books and supplies for entire program: \$700

Program Success:

58% of students who began their studies in 2009 either completed the program within the first year, or returned to the institution to continue their program for a second year

50% of graduates from this program completed it within **12 months**

Student Debt:

78% of program graduates in 2009 graduated with educational debt

Median Debt for Program Graduates:

Total: \$22,000

***Federal loans:* \$12,500**

***Private educational loans:* \$9,300**

***Institutional finance plan:* \$2,000**

60% of students who left or graduated from this institution are making payments to repay their Federal student loans

11% of students who left or graduated from this institution have defaulted on their Federal student loans

Program Outcomes:

Job placement rate for students who finished the program: 68%

Job placement rate as reported by: The Culinary Accrediting Agency

Employers that have hired graduates from this program:

Daedalus Cheese Factory

Amalfi's Family Bar and Grille

Olson's Catering and Party Supply


St. Mary and Joseph's Medical Center

Related occupations:

Chefs and Head Cooks

Bakers

 For a list of other institutions that offer this program, [click here](#).

 For a list of other institutions that offer similar programs, [click here.](#)

Baking and Pastries Arts

Program level: Certificate of at least 1 but less than 2 academic years

Program Length: 12 months (1800 contact hours)

Filter states

UnitID	Name	Address	City	State	Zip	
105525	Pima Community College	401 North Bonita Avenue	Tucson	AZ	85709-5000	web site
107664	Pulaski Technical College	3000 W Scenic Dr	North Little Rock	AR	72118-3347	web site
111009	California Culinary Academy	350 Rhode Island Street	San Francisco	CA	94103	web site
126702	The Art Institute of Colorado	1200 Lincoln Street	Denver	CO	80203-2983	web site
130916	Delaware Technical and Community College-Stanton-Wilmington	400 Stanton-Christiana Rd	Newark	DE	19702	web site
134811	AI Miami International University of Art and Design	1501 Biscayne Boulevard	Miami	FL	33132-1418	web site
136066	Lincoln College of Technology	2410 Metrocentre Boulevard	West Palm Beach	FL	33407-3105	web site
138187	Valencia Community College	190 South Orange Avenue	Orlando	FL	32801	web site
141945	Travel Institute of the Pacific	1314 S King St Ste 1164	Honolulu	HI	96814	web site
144157	City Colleges of Chicago-Kennedy-King College	6301 S Halsted St	Chicago	IL	60621-2709	web site
144865	College of DuPage	425 Fawell Blvd.	Glen Ellyn	IL	60137-6599	web site
144944	Elgin Community College	1700 Spartan Drive	Elgin	IL	60123-7193	web site
147378	Moraine Valley Community College	9000 W. College Parkway	Palos Hills	IL	60465-0937	web site
148177	The Illinois Institute of Art-Chicago	350 N Orleans St	Chicago	IL	60654-1593	web site
149532	Triton College	2000 5th Ave	River Grove	IL	60171-1995	web site
155210	Johnson County Community College	12345 College Blvd	Overland Park	KS	66210-1299	web site
157793	Sullivan University	3101 Bardstown Rd	Louisville	KY	40205-3013	web site
158662	Delgado Community College	615 City Park Ave	New Orleans	LA	70119	web site
161882	Baltimore International College	17 Commerce Street, Commerce Exchange	Baltimore	MD	21202-3230	web site
168883	Bay de Noc Community College	2001 N Lincoln Road	Escanaba	MI	49829-2511	web site
169275	Mott Community College	1401 E Court St	Flint	MI	48503	web site
170055	Grand Rapids Community College	143 Bostwick Ave NE	Grand Rapids	MI	49503-3295	web site
170240	Henry Ford Community College	5101 Evergreen Rd	Dearborn	MI	48128-1495	web site

Done

Appendix B-2

Student Ranking Forms and Results From Student Ranking of Data Elements (overall and within each category)

Focus Group on Education Information

Ranking of information overall

Please rank four pieces of information that would most affect your enrollment decision. Rank in order of importance to you, 1 through 4, with 1 being the most important and 4 the least. (You should have only 4 items ranked.)

<u>Information</u>	<u>Rank</u>
Tuition and fees	_____
Books and supplies	_____
Percent of students with debt	_____
Total median debt for graduates	_____
Median debt for graduates broken out by Federal, Private, and Institutional	_____
Percent of students in repayment of their loans	_____
Percent of students who have defaulted on their loans	_____
Percent of students who completed program within the first year/ returned to continue for a second year	_____
Percent of graduates who completed program within 12 months	_____
Job placement rate and agency reported to	_____
Employers that have hired graduates of the program	_____
Related occupations	_____

Focus Group on Education Information

Selection of information within each category

Under Information, please put an “X” on the line next to the one piece of information from each category that would most affect your enrollment decision. (You should have only 4 items marked with an “X”.)

<u>Category</u>	<u>Information</u>
Program Cost	<input type="checkbox"/> Tuition and fees <input type="checkbox"/> Books and supplies
Student Debt	<input type="checkbox"/> Percent of students with debt <input type="checkbox"/> Total median debt for graduates <input type="checkbox"/> Median debt for graduates broken out by Federal, Private, and Institutional Loans <input type="checkbox"/> Percent of students in repayment of their loans <input type="checkbox"/> Percent of students who have defaulted on their loans
Program Success	<input type="checkbox"/> Percent of students who completed program within the first year/returned to continue for a second year <input type="checkbox"/> Percent of graduates who completed program within 12 months
Program Outcomes	<input type="checkbox"/> Job placement rate and agency reported to <input type="checkbox"/> Employers that have hired graduates of the program <input type="checkbox"/> Related occupations

Student Ranking of Education Information—Overall

(in order of importance)

Information	Ranking (# of students reporting)				Tally (total students)
	First	Second	Third	Fourth	
Tuition	9				9
Books and supplies		5	3		8
Percent of students with debt					0
Total median debt for graduates				1	1
Median debt for graduates broken out by Federal, Private, and Institutional			1		1
Percent of students in repayment of their loans					0
Percent of students who have defaulted on their loans				1	1
Percent of students who completed program within the first year/returned to continue for a second year				1	1
Percent of graduates who completed program within 12 months				2	2
Job placement rate and agency reported to		4	4	1	9
Employers that have hired graduates of the program			1	2	3
Related occupations				1	1

Student Ranking of Education Information—Within Category

Category	Information	Tally (total # of students)
Program Cost	Tuition and fees	8
	Books and Supplies	1
Student Debt	Percent of students with debt	2
	Total median debt for graduates	0
	Median debt for graduates broken out by Federal, Private, and Institutional Loans	3
	Percent of students in repayment of their loans	3
	Percent of students who have defaulted on their loans	0
Program Success	Percent of students who completed program within the first year/returned to continue for a second year	3
	Percent of graduates who completed program within 12 months	6
Program Outcomes	Job Placement rate and agency reported to	7
	Employers that have hired graduates of the program	1
	Related occupations	1

Appendix B-3

Sample Template (Short Format)

Baking and Pastry Arts Certificate Program

C O S T

Q: How much will this entire program cost me?

A: Tuition and fees- \$24,000
Books and supplies- \$700

D E B T

Q: How much debt will I incur by enrolling in this program?

A: Median Debt for Program graduates by:
Federal Loans- \$12,500
Private educational loans- \$9,300
Institutional finance plan- \$2,000

For additional information on repayment rates and default rates, [click here](#).

S U C C E S S

Q: How long will it take me to complete this program?

A: 50% of graduates from this program completed it within 12 months

J O B S

Q: What are the chances of getting a job when I graduate?

A: Job Placement rate for students who complete the program- 68% (reported by The Culinary Accrediting Agency)

Q: What types of jobs will I find upon completing the program?

A: Chefs and Head Cooks, Bakers

 For a list of other institutions that offer this program, [click here](#).

Appendix C

Draft Web Application for Institutional Representatives

**Summary Report for
U.S. Department of Education
Gainful Employment Focus Groups**

Welcome to the ED Gainful Employment Disclosure Template

[\[link to User guide\]](#)

Please enter the information below for each program at your institution subject to gainful employment.

Gainful employment programs are any Title IV-eligible certificate programs at your institution. At for-profit institutions, they also include your degree programs.

Enter your institution's 6-digit OPEID:

Enter 6-digit CIP for program:

Enter the name of the program at the institution:

Select award level for program:

Enter program length in hours:

Choose one:

☐ Contact hours

☐ Credit hours

Total current tuition and fees for entire program completed in normal time:

Total current estimated costs for books and supplies for entire program:

Total current annual room and board (if on-campus living offered) ☐ Check here if not offered

Enter percent of completers who graduated in 2009-10 with student loan debt:

For each of the following, please enter the Median Cumulative Debt for all completers (both borrowers and non-borrowers) of the program in 2009:

Total (combined Federal, private, and institutional)

Federal

Private/Other

Institutional financing plans

Enter the number of students who entered the program in Fall 2009:

Of those students, enter the number of students who:

Completed the program by Fall 2010

Returned to continue their studies in Fall 2010

Enter the normal time to complete program in months:

Enter the number of students who completed the program in 2009-10:

Of those, how many completed the program within the normal amount of time?

Enter the job placement rate for 2009-10 program completers as reported to your accrediting or state agency:

Name of the agency you report this rate to:

Please enter the names of up to five employers that have hired the highest numbers of graduates from this program in the last five years.

1.
2.
3.
4.
5.

In the box below, please enter any additional context notes or explanations that would be helpful for prospective students to know about the information provided above. (2,000 character maximum)

Drop down box:

- Certificate
- Associate's degree
- Bachelor's degree
- Master's degree
- Doctor's degree